

UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA  
v.  
ADEMOLA KAYODE, Jr.

Criminal Case No. CR 18 30 WES

In Violation of 18 U.S.C. §§ 922(g)(3) &  
924(a)(2), 18 U.S.C. §§ 922(a)(6) &  
924(a)(2), and 18 U.S.C. § 1001(a)(2).

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Possession of a firearm by an unlawful user of a controlled substance)

On or about May 5, 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., who was an unlawful user of a controlled substance, specifically marijuana, did knowingly and intentionally possess firearms – specifically two Taurus PT111 9mm semi-automatic pistols (serial numbers TJO54891 and TJO54070) – in and affecting interstate commerce, in violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

COUNT 2

(False statement during purchase of firearms)

On or about April 27th and May 5th in 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., in connection with the acquisition of firearms, specifically two Taurus PT111 9mm semi-automatic pistols (serial numbers TJO54891 and TJO54070), from D & L Shooting Supplies, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, knowingly made to that dealer a false and fictitious written statement that was intended and likely to deceive the dealer as to a fact material to the lawfulness of such sale of the said firearm to Defendant under Chapter 44 of Title 18, in that Defendant executed and provided to the dealer an ATF Form 4473 specifying that he was not an unlawful user of marijuana when in fact he knew that he was, in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

**COUNT 3**

(Possession of a firearm by an unlawful user of a controlled substance)

On or about May 23, 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., who was an unlawful user of a controlled substance, specifically marijuana, did knowingly and intentionally possess firearms – specifically two Taurus PT111 9mm semi-automatic pistols (serial numbers TJP77432 and TJP23722) – in and affecting interstate commerce, in violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

**COUNT 4**

(False statement during purchase of firearms)

On or about May 14th and May 23rd in 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., in connection with the acquisition of firearms, specifically two Taurus PT111 9mm semi-automatic pistols (serial numbers TJP77432 and TJP23722), from D & L Shooting Supplies, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, knowingly made to that dealer a false and fictitious written statement that was intended and likely to deceive the dealer as to a fact material to the lawfulness of such sale of the said firearm to Defendant under Chapter 44 of Title 18, in that Defendant executed and provided to the dealer an ATF Form 4473 specifying that he was not an unlawful user of marijuana when in fact he knew that he was, in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

**COUNT 5**

(Possession of a firearm by an unlawful user of a controlled substance)

On or about June 24, 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., who was an unlawful user of a controlled substance, specifically marijuana, did knowingly and intentionally possess firearms – specifically a Smith & Wesson SW40VE .40 caliber semi-automatic pistol (serial number HEC4986); a Smith & Wesson SW9VE 9mm semi-automatic pistol (serial number RAW3837); a Taurus PT140 G2 .40 caliber semi-automatic pistol (serial number SIV49734); and a Taurus PT111 9mm semi-automatic pistol (serial number TJP23371) – in and affecting interstate commerce, in violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

**COUNT 6**

(False statement during purchase of firearms)

On or about June 16th and 24th in 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., in connection with the acquisition of firearms, specifically a Smith & Wesson SW40VE .40 caliber semi-automatic pistol (serial number HEC4986); a Smith & Wesson SW9VE 9mm semi-automatic pistol (serial number RAW3837); a Taurus PT140 G2 .40 caliber semi-automatic pistol (serial number SIV49734); and a Taurus PT111 9mm semi-automatic pistol (serial number TJP23371), from D & L Shooting Supplies, a licensed dealer of firearms within the meaning of Chapter 44 of Title 18 of the United States Code, knowingly made to that dealer a false and fictitious written statement that was intended and likely to deceive the dealer as to a fact material to the lawfulness of such sale of the said firearm to Defendant under Chapter 44 of Title 18, in that Defendant executed and provided to the dealer an ATF Form 4473 specifying that he was not an unlawful user of marijuana when in fact he knew that he was, in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).

COUNT 7

(False statements to federal agents)

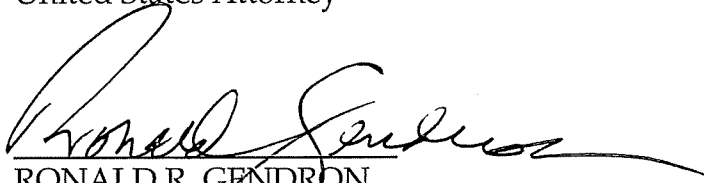
On or about July 28, 2016, in the District of Rhode Island, Defendant ADEMOLA KAYODE, Jr., knowingly and willfully made a materially false and fictitious statement and representation to a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, in a matter within the jurisdiction of the Bureau, by falsely stating and asserting that on July 28, 2016 no firearms that he had purchased were present on the premises of 37 Vickery Street, Warwick, RI, at a time when he believed said firearms were located in a shed on said premises, in violation of 18 U.S.C. §§ 1001(a)(2).

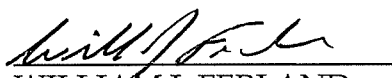
A TRUE BILL:

**REDACTED**

Date: 22 MARCH 2018

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